REMARKS

Entry of this Amendment and reconsideration are respectfully requested in view of the amendments made to the claims and for the remarks made herein.

Claims 1-11 are pending and stand rejected. Claims 1, 2, and 3 have been amended.

Claims 3-11 stand rejected under 35 USC 112, second paragraph as being indefinite. Claim 3 recites the term "the quantization means is a random-access memory." The term RAM refers to memory which cannot perform the role of quantization, gamma correction, etc.

Applicant respectfully disagrees with and explicitly traverses the rejection of the claims.

The specification teaches a system wherein a memory containing values that may be used to determine a quantization error. The specification illustrates in Figures 2 and 3 and describes on page 4, lines 15-21 a process for using the content of the memory as a quantization device. An example of the determination of a pixel value to be displayed based on the processing according to the values in the memory is shown on page 5, lines 9-20. In addition, the process using two memories-- one for MSB and the other LSB—is described with regard to Figure 6 and on page 6, lines 6-26.

Hence, applicant submits that there is sufficient disclosure in the specification for one skilled in the art to appreciate that the memory operates as a quantizer by multiplying an incoming data point by specified data values and by means of the example provided allow one skilled in the art to practice the invention claimed without undue experimentation.

For the remarks made herein, applicant submits that the reason for the reduction has been overcome.

Claims 1-3, 5 and 7 stand rejected under 35 USC 103 (a) as being unpatentable over Van Dalfsen (USPPA 2001/0005186) in view of Kwak (USP no. 6,166,781).

Applicant respectfully disagrees with and explicitly traverses the rejection of the claims. However, in order to advance the prosecution of this matter, the independent claims 1, 2 and 3 have been amended to further recite <u>that elements of each of said memory represent absolute</u> <u>values associated with neighboring pixels by which a quantization error is determined at a</u>

current pixel value. No new matter has been added. Support for the amendment may be found at least in Figures 2 and 3 and on page 4, lines 15-21 and page 5, lines 9-25.

Van Dalfsen discloses a display system including a plurality of sub-fields for outputting a respective illumination level in which in each sub-field, a pixel may emit an amount of light corresponding to the particular sub-field, depending on whether it is switched on or not. Van Dalfsen discloses, with regard to Figure 3, a quantizer 304 that provides a quantized signal to a look-up table 306. The look up table contains available illumination levels and specifies combinations of the available sub-fields to be used for the respective levels. Thus, the lookup table provide corrections to the quantized value and does not perform the quantization of the input data. In addition, Van Dalfsen fails to disclose a coarse quantization in a first memory and a fine quantization in a second memory.

Kwak discloses a correction apparatus using two lookup tables to process a data stream. Referring to Figures 2 and 7, Kwak discloses applying the upper bits (U) to each of the lookup tables. The first lookup table includes first data that is accessed or addressed by the upper bits while the second lookup table includes second data that is also accessed or addressed by the upper bits. The second data is then multiplied by the lower bits. (see col. 5, lines 1-25). Hence, Kwak fails to disclose using the upper and lower bits to address the first and second lookup tables, as is recited in the claims.

Accordingly, even if the teachings of Kwak were incorporated into the teachings of Van Dalfsen, the combined device would not disclose the elements recited in the independent claims. The combined device, first, would not perform quantization using the memories and, second, would not use the upper and lower bits to access the memories to perform a coarse and fine quantization.

A claimed invention is prima facie obvious when three basic criteria are met. First, there must be some suggestion or motivation, either in the reference themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the teachings therein. Second, there must be a reasonable expectation of success. And, third, the prior art reference or combined references must teach or suggest all the claim limitations.

As shown, Van Dalfsen fails to disclose a material element recited in the independent claims and Kwak fails to provide any teaching to correct the deficiency found to exist in Van Dalfsen. Hence, the combination of Van Dalfsen and Kwak fails to teach all the elements recited

in the independent claims.

Having shown that the combined device resulting from the teachings of the cited references fails to include all the elements of the present invention, applicant submits that the rejection of the subject matter recited in the independent claims has been overcome.

With regard to the remaining dependent claims, these claims ultimately depend from the independent claims and, thus, the remaining dependent claims are also allowable by virtue of their dependence from an allowable base claim, without arguing the merits of each claim individually. .

Claims 4 and 6 stand rejected under 35 USC 103(a) as being unpatentable over Van Dalfsen and Kwak in view of Okada (USP no.5,854,799) and claims 8-12 stand rejected under 35 USC 103(a) as being unpatentable over Van Dalfsen and Kwak and further in view of Lengyel (USP no. 6,614,428).

Applicant respectfully disagrees with and explicitly traverses the rejection of the claims. Each of the aforementioned claims depends from one of the independent claims, which have been shown to include subject matter not disclosed by the cited reference. Neither Okada nor Lengyel provide any teaching to correct the deficiency found to exist in the combined device of Van Dalfsen and Kwak. Accordingly, each of the aforementioned claims is not rendered obvious based on the cited references, as the combination of the cited references fails to disclose all the elements recited in the claims.
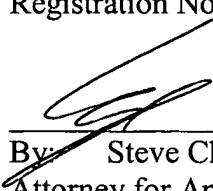
For the amendments to the claims and for the remarks herein, applicant submits that all the claims are in an allowable form and respectfully requests that the rejections be withdrawn. The issuance of a Notice of Allowance is also respectfully requested.

Should the Examiner deem that there are any issues which may be best resolved by telephone, please contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

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Date: October 23, 2008

By: Steve Cha
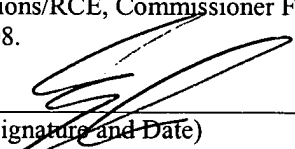Attorney for Applicant
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